

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
Eastern Division (Youngstown)**

Susan Beiersdorfer, <i>et al.</i> ,)	
Plaintiffs,)	
v.)	Case No. 4:19-cv-00260
Frank LaRose, Secretary of State, <i>et al.</i> ,)	Judge Pearson
Defendants.)	
)	

* * * * *

**PLAINTIFFS' UNOPPOSED MOTION FOR RESCHEDULING
OF CASE MANAGEMENT CONFERENCE**

Now come Plaintiffs Susan Beiersdorfer *et al.*, by and through counsel, and move the Court to reschedule the currently-scheduled April 24, 2019 Case Management Conference because of the inability of Plaintiffs' counsel to prepare and attend because of a previously-scheduled trial in Lucas County Common Pleas Court.

/s/ Terry J. Lodge
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Counsel for Plaintiffs

MEMORANDUM

The Court notified the parties of its scheduling of the April 24, 2019 Case Management Conference on March 11, 2019. Counsel for Plaintiffs represents that he has a directly conflicting

matter, namely, an April 22, 2019 civil jury trial in Lucas County, Ohio, Court of Common Pleas, captioned *Stachura et al. v. City of Toledo*, Case No. 2015-3463. Counsel has attached to this motion the Common Pleas order setting the Stachura matter for trial. It is expected to proceed for two full weeks.

Plaintiffs' counsel has consulted with opposing counsel to determine whether there are any objections to this request, and there are none. Counsel for the Secretary of State, Athens County Board of Elections ("BOE"), Franklin County BOE, Lucas County BOE, Medina County BOE and Mahoning County BOE have expressly stated that they have no objection. There is no response from counsel for the remaining Defendants Boards of Elections.

Counsel requests for the CMC to be rescheduled to a date after May 15, 2019 or in June, but not on any of the following dates: May 24 and 31, and June 10–19, 2019.

WHEREFORE, Plaintiffs pray the Court allow rescheduling of the Case Management Conference from April 24, 2019 to a date convenient to the parties as suggested above.

/s/ Terry J. Lodge
Terry J. Lodge, Esq.
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 29, 2019, I deposited a copy of the foregoing Plaintiff's Unopposed Motion for Rescheduling of Case Management Conference in the Electronic Case Filing system maintained by the Court, and that according to protocols of the system, it was electronically served upon all counsel registered to receive electronic filings.

/s/ Terry J. Lodge
Terry J. Lodge, Esq.
Counsel for Plaintiffs

IN THE COURT OF COMMON PLEAS, LUCAS COUNTY, OHIO

CARLA STACHURA, et al.,
Plaintiffs,

vs.

CITY OF TOLEDO DEPT OF FIRE AND RESCUE et al.
Defendants.

REVISED PRETRIAL ORDER

Case No. G-4801-CI-0201503463-000

JUDGE LINDA J JENNINGS

Pursuant to Ohio Rule of Civil Procedure 16, and L.C. Court Rule 5.06, it is ORDERED that:

FINAL PRETRIAL: APRIL 12, 2019 AT 9:00 A.M.

TRIAL DATE: APRIL 22, 2019 AT 9:00 A.M. Pursuant to Local Rule 5.07, any party to file first jury demand shall file a Jury Fee Deposit (\$200) & Notice of filing or failure to file the jury deposit to opposing counsel at least 14 days prior to trial. Thereafter, any other party may deposit \$200 at least 7 days prior to trial with notice to opposing counsel.

PARTIES MUST INITIATE A TELEPHONE CONFERENCE WITH THE COURT PRIOR TO FILING ANY MOTION TO COMPEL.

DISCOVERY and Notice given pursuant to R.C. Section 2307.23(c) to be completed by: DATE PREVIOUSLY SET

MOTIONS FOR SUMMARY JUDGMENT to be filed by: DATE PREVIOUSLY SET

PLAINTIFF'S EXPERT WITNESS disclosure to be filed by: DATE PREVIOUSLY SET

DEFENDANT'S EXPERT WITNESS disclosure to be filed by: DATE PREVIOUSLY SET

Unless otherwise ordered, names of fact witness(es) are to be exchanged by parties sixty (60) days prior to trial pursuant to Gen. R.5.06(D).

TRIAL DEPOSITIONS to be completed by: DATE PREVIOUSLY SET

TRIAL BRIEFS, PROPOSED JURY INSTRUCTIONS, MOTIONS IN LIMINE and EXHIBITS to be filed by: DATE PREVIOUSLY SET

All exhibits are to be marked prior to trial with plaintiff's exhibits to be numbered consecutively and defendant's exhibits lettered consecutively.

All motion practice is subject to the terms set out in Gen R. 5.04.

UPON THE REQUEST OF DEFENDANTS, THE TRIAL DATE OF MARCH 18, 2019 IS HEREBY VACATED.

3-7-19
Date


JUDGE LINDA J JENNINGS

cc: TERRY J. LODGE
MERRITT W. GREEN, III
JEFFREY B. CHARLES

E-JOURNALIZED

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